

Time and Effort Reporting

What is time and effort reporting?

Federal regulations require each employee funded under a federal grant to have documentation of time and effort reporting. This type of reporting will provide evidence to ensure consistency between what was projected in the federal application and how the funding was actually spent. This guidance document is directed to those agencies funded by Part B of the Individuals with Disabilities Act or IDEA 04. The funding sources include Part B 611 and 619, commonly referred to as “Part B Regular” and “Preschool” grants as well as any respective additional awards such as the 2009-2010 IDEA Stimulus.

Time and effort reporting should be maintained by the grant subrecipient and should be submitted to the awarding agency when requested as part of general monitoring responsibilities, either through record audits or when a specific circumstance requires evidence of time and effort reporting.

Time and effort reporting requirements are part of documentation to support an allowable cost as defined by the U.S. Office of Management and Budget (OMB). [OMB Circular A-87](#) Attachment B, Section 11 provides rules and regulations related to compensation for personal services. Subsection “h” differentiates the requirements of a semi-annual certification from the requirements of a detailed monthly log. The rule also states charges to federal awards for salaries and wages, whether treated as direct¹ or indirect costs², will be based on payroll records documented in accordance with generally accepted practice of the governmental unit and approved by a responsible official(s) of the governmental unit.

What are consequences for not keeping federal grant time and effort reports?

Time and effort will be monitored by the Indiana Department of Education through its procedural desk audits. Local Educational Agencies (LEAs) found to be out of compliance with time and effort regulations will be issued a finding and required to implement prescribed corrective action to ensure correction. The US Office of the Inspector General (OIG) and the Indiana State Board of Accounts may also monitor information related to time and effort reporting.

¹ OMB circular A 87 Attachment A (E1) defines direct cost as those that can be identified specifically with a particular final cost objective.

² OMB circular A 87 Attachment A (F1) defines indirect costs as those: (a) incurred for a common or joint purpose benefiting more than one cost objective, and (b) not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved.

Description of time and effort reporting:

OMB Circular A-87 requires two forms of time and effort reporting related to employees funded from a federal grant. Those include:

- Semi-annual certification - This certification is completed at least twice a year for staff funded under one federal funding source and one cost objective.
- Time and effort log (sometimes referred to as a personnel activity report or PAR) - This log must be completed at least monthly for all staff funded by multiple federal funding sources and/or cost objectives.

Examples of different federal funding sources include:

- 611 ("Part B Regular")
- 619 ("Part B Preschool")
- Part B Regular Stimulus
- Part B Preschool Stimulus
- Title I
- Title III

Four common cost objectives that could be utilized when documenting time and effort could include but are not limited to:

- Providing a Free Appropriate Public Education (FAPE) to children identified with special needs.
- Coordinated Early Intervening Services (CEIS) activities.
- Non-public school children receiving special education services as part of proportionate share activities.
- General Education. This would not be considered an allowable Part B funded activity; however it may need to be included in a time and effort report if an employee is working under a different cost objective and paid with local resources.

Who should complete a semi-annual certification and what are the requirements?

Staff who are funded by either one federal funding source and one cost objective, or one federal funding source and a combination of state and local funds who work under one cost objective, should complete a semi-annual certification at least twice a year.

A semi-annual certification should identify the following:

- Employer's name
- Employee's name
- Federal program
- Reporting period
- Employee's position
- Single cost objective

The certification must be signed by the employee or supervisory official having firsthand knowledge of the work performed by the employee. The person who is responsible for management and

administration of a district's special education programs should make sure that the certification is filled out correctly and available upon request.

A sample of a semi-annual certification can be found in Appendix A on page 6 of this document.

Who should complete a personal activity report (PAR) and what are the requirements?

Employees funded by more than one federal funding source and/or multiple cost objectives must complete a time and effort log commonly referred to as a personal activity report or PAR. The purpose of a PAR is not to address whether the cost is allowable or not allowable under Part B. The purpose is to document 100% of the employee's work effort.

A PAR should identify the following:

- Employer's name
- Employee's name
- Federal program and cost objective
- Reporting period
- 100% of work activities
- Employee's signature

The PAR should coincide with one or more pay periods. Time should be documented in hours, not percentages on the report (per State Board of Accounts). The employee should document 100% of his/her work effort (full or part time) on the PAR. The employee must document the portion of time and effort dedicated to the each federal program and each cost objective supported by other revenue sources. Projections cannot be used to document a PAR.

Direct and indirect time should be listed on the PAR. A fringe benefit would be considered indirect time. [OMB Circular A-87](#) states that fringe benefits can include regular compensation paid to employees during periods of authorized absences from the job, such as for annual leave, sick leave, holidays, court leave, military leave, and other similar benefits.

The PAR must be signed and dated by the employee. The person who is responsible for management and administration of a district's special education programs should make sure that the PAR is filled out correctly and available upon request.

A sample of a PAR can be found in Appendix B on page 7 of this document.

Potential Scenarios:

Single Federal Funding Source - Single Cost Objective

- Example 1: The salary of a teacher providing only special education services 100% of the day is charged 100% to the IDEA Part B 611 grant. **Reporting Required: semi-annual certification**
- Example 2: An office assistant works for the special education team 100% and is funded partially through an IDEA Part B 611 grant and partially with local funds. Since all the work is for special education and there is only one federal funding source, this is reported as a single cost objective. **Reporting Required: semi-annual certification**

Single Federal Funding Source - Multiple Cost Objectives

- Example 1: A school psychologist works 50% of the day with special education and 50% of the day providing coordinated early intervening services (CEIS). Both activities are funded through an IDEA Part B 611 grant; however, the objectives are different. The school psychologist must document his time to ensure that the amounts charged to Part B and CEIS are accurate. Each month the school psychologist tracks the time spent on each of the two cost objectives: FAPE and CEIS. **Reporting Required: PAR at least Monthly**
- Example 2: IDEA requires that each LEA set-aside a proportionate share of federal funds to provide equitable services to parentally placed private school children. A speech and language pathologist (SLP) funded out of an IDEA Part B 611 grant spends 25% of her time performing duties related to parentally placed private school children and 75% of her time with children with disabilities attending public school. To capture the cost of the time spent on parentally placed private school children and ensure the LEA's equitable set-aside is met, the SLP must differentiate the cost of the salary paid for equitable services from other services. Each month, the SLP tracks the time spent on each of the two cost objectives: FAPE and Proportionate Share. **Reporting Required: PAR at least Monthly**

Multiple Federal Funding Sources - Single Cost Objective

- Example 1: An early childhood special education teacher is funded 80% with an IDEA Part B 611 grant and 20% with an IDEA Part B 619 grant. Although the cost objective might be the same, the employee is funded by two different federal funding sources. **Reporting Required: PAR at least Monthly**
- Example 2: A Special Education Director is charged 50% to the annual IDEA Part B 611 grant and 50% to the Part B 619 grant. Although the cost objective might be the same, the employee is funded by two different federal funding sources. **Reporting Required: PAR at least Monthly**

Multiple Federal Funding Sources - Multiple Cost Objectives:

- Example 1: A teacher provides special education services to students 60% of the time (funded by an IDEA Part B 611 grant) and bilingual instruction to English Language Learners 40% of the time (funded by an ESEA Title III). This represents two different federal funding sources. Since the services are not the same, two cost objectives are reported as well. **Reporting Required: PAR at least Monthly**
- Example 2: A special education teacher is a project director for a federal discretionary grant focusing on Positive Behavior Supports (PBS) supporting all students and also paid out of the IDEA Part B 611 grant for services provided to students with disabilities. Since the focus of the discretionary grant is for all students, and IDEA is for students with disabilities, two cost objectives and federal funding sources are reported. **Reporting Required: PAR at least Monthly**

Frequently Asked Questions:

- **Question 1:** My school corporation has been selected to participate in the LEA procedural audit. We belong to a special education cooperative where the cooperative is our fiscal agent and submits and manages our Part B grants collectively for all districts. These funds are co-mingled to support shared services throughout the cooperative. How can our selected LEA's required documentation be broken out from the original grant request?

Response: If your Part B application was not broken out separately to account for local expenses when the Part B grant was submitted and approved, then the information requested in the LEA procedural audit will need to include the entire cooperative. This same guidance would also apply to an Interlocal.

- **Question 2:** We belong to a special education cooperative where many of our employees work at multiple school districts under the direction of the cooperative. How would time and effort be documented in these cases?

Response: The employee would only need to complete either the semi-annual certification or a PAR for the cooperative as a whole. When submitting materials put the name of the cooperative in the field indicating the employer and provide a narrative describing how the employee provides services at the LEA and also provides services at other LEAs within the cooperative.

- **Question 3:** I have a part time school psychologist who works on a reduced schedule. He works with students with and without disabilities. Does being part time change how the information would be documented on PAR?

Response: No, the PAR would be filled out with 100% of the employee's scheduled work hours being documented.

- **Question 4:** Would grant funds such as the 2009-2010 ARRA 611 and ARRA 619 awards be considered separate federal funding sources when determining whether to complete a semi-annual certification or a PAR?

Response: Yes, these awards would be considered separate federal funding sources and different from the annual Part B 611 and 619 grant allocations.

Appendix A: Semi-annual certification - The following sample documents several employees all under the same federal funding source and the same cost objective. While the format is not required, it is important that all the fields previously listed on page 2 are included.

Semi-Annual Certification
Activity Report for Employees Working on a Single Cost Objective
School Year 2009

School/District Office: Sample School District

For the Six-Month Period: July 1, 2009 through December 31, 2009
Month/Year

Single Cost Objective:

This is to certify that the following individuals have worked 100% of their time under the IDEA Part B 611 program on the following cost objective from July 1, 2009 through December 31, 2009.

Providing a FAPE to children identified with special needs.

| Employee Name | Employee Position |
|---------------|---------------------------------|
| John Sample | Occupational Therapist |
| Jane Sample | Special Education Director |
| Scott Sample | LD Teacher |
| Sue Sample | Speech and Language Pathologist |

Pete Supervisor

Supervisor with Direct Knowledge

January 15, 2010

Date

This form is to be completed every six months for any employee who is paid solely from a single federal funding source and a single cost objective.

Appendix B: Personal Activity Report (PAR) - The following sample documents one employee's PAR. While the format is not required, it is important that all the fields previously listed on page 3 are included.

Sample Personal Activity Report

Sample School Corporation

Name: John Sample

Title: Behavior Support Teacher

Month: March

Year: 2010

| Direct Time Program /Cost Objective | Account for all time worked per day. (Minimum of 1/4 hour increments) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | Tot Hrs |
|--|--|---|---|---|---|---|---|---|---|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|------------|
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 | 21 | 22 | 23 | 24 | 25 | 26 | 27 | 28 | 29 | 30 | 31 | |
| IDEA 04 Part B 611 – FAPE | 4 | 4 | 4 | 4 | 4 | 0 | 0 | 4 | 4 | 4 | 4 | 4 | 0 | 0 | 4 | 4 | 4 | 4 | 4 | 0 | 0 | 4 | 4 | 4 | 4 | 4 | 0 | 0 | 4 | 4 | 4 | 92 |
| IDEA 04 Part B 611 – CEIS | 2 | 2 | 2 | 2 | 2 | | | 2 | 2 | 2 | 2 | 2 | | | 2 | 2 | 2 | 2 | 2 | | | 2 | 2 | 2 | 2 | 2 | | | 2 | 2 | 2 | 46 |
| General Fund | 2 | | 2 | 2 | 2 | | | 2 | 2 | 2 | | 2 | | | 2 | 2 | 2 | 2 | 2 | | | 2 | 2 | 2 | 2 | 2 | | | 2 | 2 | 2 | 42 |
| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| SUBTOTAL | 8 | 6 | 8 | 8 | 8 | 0 | 0 | 8 | 8 | 8 | 6 | 8 | 0 | 0 | 8 | 8 | 8 | 8 | 8 | 0 | 0 | 8 | 8 | 8 | 8 | 8 | 0 | 0 | 8 | 8 | 8 | 180 |
| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| INDIRECT TIME | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sick Leave | | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 2 |
| Holiday | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Prof. Development | | | | | | | | | | | 2 | | | | | | | | | | | | | | | | | | | | | 2 |
| Other (Describe) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| SUBTOTAL | | 2 | | | | | | | | | 2 | | | | | | | | | | | | | | | | | | | | | 4 |
| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| GRAND TOTALS | 8 | 8 | 8 | 8 | 8 | 0 | 0 | 8 | 8 | 8 | 8 | 8 | 0 | 0 | 8 | 8 | 8 | 8 | 8 | 0 | 0 | 8 | 8 | 8 | 8 | 8 | 0 | 0 | 8 | 8 | 8 | 184 |

Time must be documented in hours, not percent. (OMB) Circular A-87 "Time distribution"

I certify this report to be accurate and an after the fact determination of my total activity for the reporting period.

Signature: John Sample

Date: 4/15/2010

Supervisor initials: GRC